

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION, OHIO

UNITED STATES OF AMERICA	:	CASE NUMBER: 1:19 CR 00464 (14)
Plaintiff	:	JUDGE JOHN R. ADAMS
v.	:	
STEVEN BOUYER	:	MOTION FOR EXTENSION OF TIME TO DRAFT AND SUBMIT PLEA
Defendant	:	AGREEMENT

Now comes the defendant Steven Bouyer, by and through undersigned counsel and respectfully requests and moves this Honorable Court for an extension of time to draft and enter into a Plea Agreement.

Counsel was just retained one week ago and would request the indulgence of the Court to extend this time limit so that Counsel can receive and review discovery, consult with the defendant and the AUSA Margaret Sweeney, toward a resolution of this case by way of a Plea Agreement.

WHEREFORE, in view of the foregoing, Counsel would respectfully request and move this Honorable Court to extend the time to reach a Plea Agreement for the reasons stated herein.

Respectfully submitted,

/s/ Ralph T. DeFranco
RALPH T. DeFRANCO 0024299
ATTORNEY FOR DEFENDANT
55 Public Square - Ste. 1600
Cleveland, Ohio 44113
216-696-4600 216-696-4606 fax
rtdefranco@ameritech.net

SERVICE

A copy of the foregoing Motion for Extension of Time has been forwarded to all parties via this Court's parties this Court's electronic filing system, on this 3rd day of May, 2020.

/s/ Ralph T. DeFranco

Ralph T. DeFranco, Attorney for Defendant